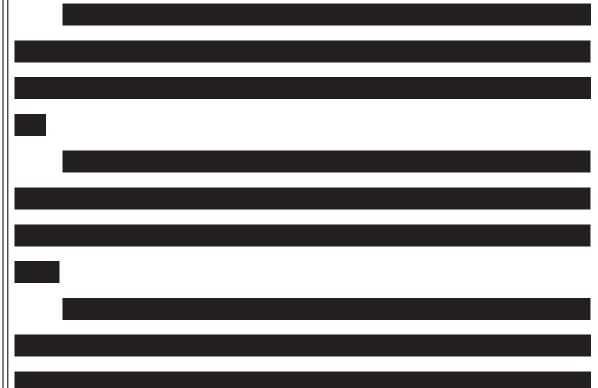
1	Ronald Gainor, Esq. Florida Bar No. 0606960	
2	6414 Fairways Drive Longmont, CO 80503	
3	Phone: (720) 201-3036 Fax: (305) 537-2001	
4	gainorlaw@gmail.com Pro Hac Vice	
5		
6	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA	
7	SAN JOSE DIVISION	
8		
9	KCG AMERICAS LLC, a Delaware limited liability company, and KCG HOLDINGS, INC., a Delaware	Case No. 5:17-cv-1953
10	HOLDINGS, INC., a Delaware corporation,	[Hon. Edward J. Davila]
11	Plaintiffs,	
12	V.	NOTICE OF MOTION AND
13	ZHENGQUAN ZHANG, an	MOTION TO WITHDRAW AS ATTORNEY OF RECORD FOR
14	individual,	ZHENGQUAN ZHANG
15	Defendant.	
16		
17	NOTICE OF MOTION PERMITTING WITHDRAWAL OF COUNSEL	
18		
19	To the Clerk of this Court and all parties and their counsel of record:	
	To the Clerk of this Court and an parties and	their counsel of record:
20		their counsel of record: ld Gainor, <i>Pro Hac Vice</i> counsel of record
20 21		ld Gainor, Pro Hac Vice counsel of record
	PLEASE TAKE NOTICE that Rona	ld Gainor, <i>Pro Hac Vice</i> counsel of record tively "Counsel"), upon this Motion and
21	PLEASE TAKE NOTICE that Rona and Adam Pennella, local counsel (collect Declaration, seek to withdraw as counsel of respectively).	ld Gainor, <i>Pro Hac Vice</i> counsel of record tively "Counsel"), upon this Motion and ecord for Defendant Zhengquan Zhang, and
21 22	PLEASE TAKE NOTICE that Rona and Adam Pennella, local counsel (collec	ld Gainor, <i>Pro Hac Vice</i> counsel of record tively "Counsel"), upon this Motion and ecord for Defendant Zhengquan Zhang, and
21 22 23	PLEASE TAKE NOTICE that Rona and Adam Pennella, local counsel (collect Declaration, seek to withdraw as counsel of respectively).	ld Gainor, <i>Pro Hac Vice</i> counsel of record tively "Counsel"), upon this Motion and ecord for Defendant Zhengquan Zhang, and
21 22 23 24	PLEASE TAKE NOTICE that Rona and Adam Pennella, local counsel (collect Declaration, seek to withdraw as counsel of relative the hereby move this Court for an order permitting	Id Gainor, <i>Pro Hac Vice</i> counsel of record tively "Counsel"), upon this Motion and ecord for Defendant Zhengquan Zhang, and ag them to withdraw.
21 22 23 24 25	PLEASE TAKE NOTICE that Rona and Adam Pennella, local counsel (collect Declaration, seek to withdraw as counsel of relative hereby move this Court for an order permitting Page - 1	Id Gainor, <i>Pro Hac Vice</i> counsel of record tively "Counsel"), upon this Motion and ecord for Defendant Zhengquan Zhang, and ag them to withdraw.
21 22 23 24 25 26	PLEASE TAKE NOTICE that Rona and Adam Pennella, local counsel (collect Declaration, seek to withdraw as counsel of relative the hereby move this Court for an order permitting	Id Gainor, <i>Pro Hac Vice</i> counsel of record tively "Counsel"), upon this Motion and ecord for Defendant Zhengquan Zhang, and ag them to withdraw.

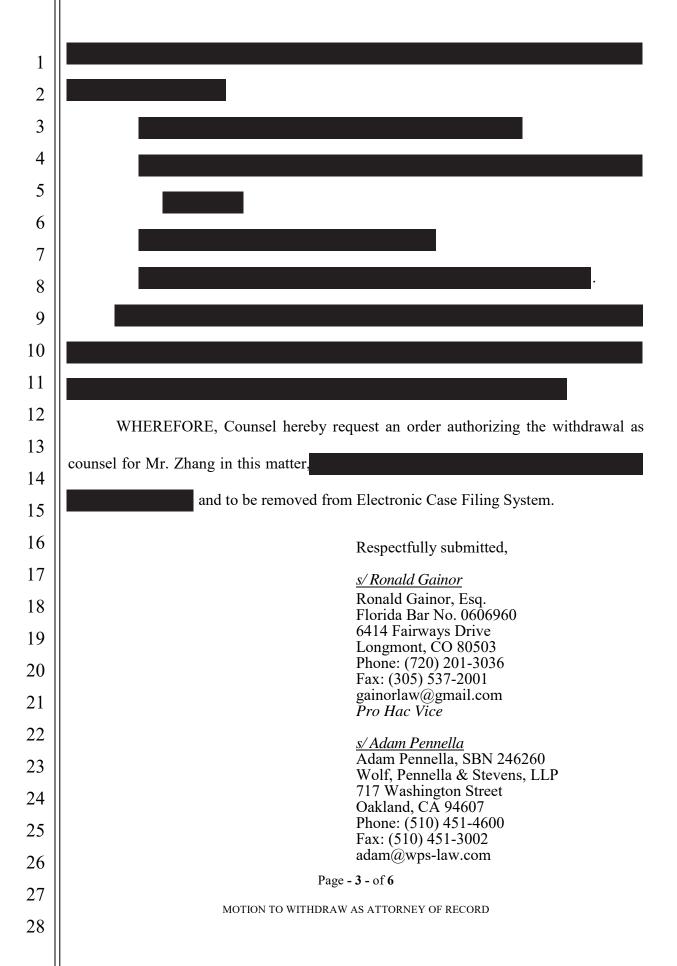
MOTION FOR ORDER PERMITTING WITHDRAWAL OF COUNSEL

Pursuant to Rule 3-700 of the California Rules of Professional Conduct and Civil Local Rule 11-5, Counsel seek to be relieved as counsel in the instant litigation. Mr. Gainor currently serves as *Pro Hac Vice* counsel for Defendant and Mr. Pennella as local counsel; both seek to withdraw as counsel.

A Complaint was served on the Defendant on April 7, 2017 seeking, among other things, a permanent injunction against the Defendant. Pursuant to this Court's Order dated August 11, 2017 [D.E. 27], this matter was stayed pending the resolution of a related criminal action, *United States of America v. Zhengquan Zheng*, Crim. Action No. 17-cr-560-JMF, United States District Court, Southern District of New York. The criminal matter is still pending.



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Local Counsel

Attorneys for Defendant Zhengquan Zhang

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DECLARATION OF RONALD GAINOR RONALD GAINOR, hereby declares the following to be true: I am a member of the law firm of Gainor & Donner, attorneys for 1. Zhengquan Zhang, the defendant in the above-captioned matter. 2. I make this declaration in support of the Motion to Withdraw as Counsel. 3. 4. foregoing is true and correct. Executed this 4th day of May, 2018 in Miami, Florida. Page - 5 - of 7 MOTION TO WITHDRAW AS ATTORNEY OF RECORD

CERTIFICATE OF SERVICE I hereby certify that on the 4th day of May, 2018, I filed the foregoing Notice, Motion and Declaration with the Clerk of the United States District Court for the Northern District of California by using the CM/ECF system. I declare under penalty of perjury that the foregoing is true and correct. Executed on May 4, 2018. s/Ronald Gainor Ronald Gainor, Esq. Page - 6 - of 6 MOTION TO WITHDRAW AS ATTORNEY OF RECORD